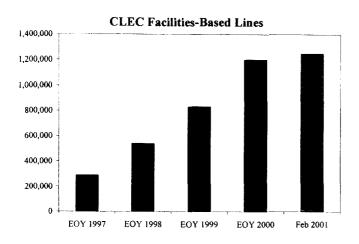
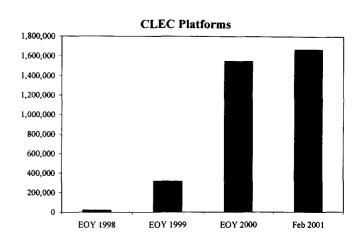
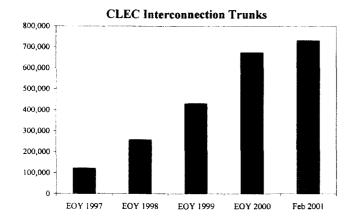
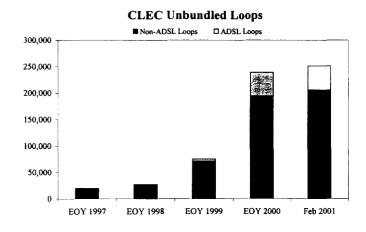
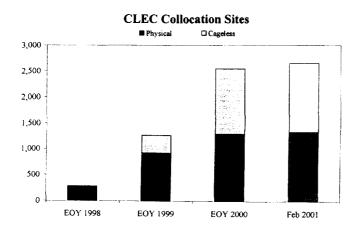
Exhibit 4. Local Competition in New York

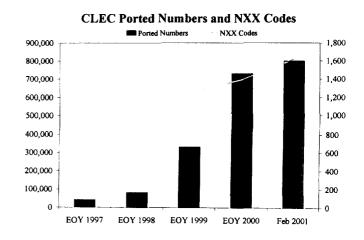












Required Statements

Pursuant to the Commission's March 23, 2001 Public Notice entitled <u>Updated Filing</u> Requirements for Bell Operating Company Applications Under Section 271 of the Communications Act, DA 01-734 (rel. March 23, 2001), Verizon states as follows:

- (a) pages i-v of this Brief contain a table of contents;
- (b) pages 1-3 of this Brief contain a concise summary of the substantive arguments presented;
- (c) pages 4-9 of this Brief contain a statement identifying how Verizon meets the requirements of section 271(c)(1), including a list of the specific agreements on which Verizon bases its application. There were no federal court challenges to these agreements pursuant to section 252(e)(6);
- (d) pages 75-79 of this Brief contain a statement summarizing the status of the Connecticut Department of Public Utility Control's proceeding examining Verizon's compliance with section 271;
- this Brief contains all legal and factual arguments that the three requirements of section 271(d)(3) have been met, and is supported as necessary with selected excerpts from the supporting documentation (with appropriate citations): pages 9-66 address the requirements of section 271(d)(3)(A); pages 66-70 address the requirements of section 271(d)(3)(B); and pages 71-82 address the requirements of section 271(d)(3)(C));
- (f) pages iii-v of and Attachment C to this Brief contain a list of all appendices (including affidavits) and the location of and subjects covered by each of those appendices has been included;
- inquiries relating to access (subject to the terms of any applicable protective order) to any confidential information submitted by Verizon in this application should be addressed to: Steven McPherson, Verizon, 1320 North Court House Road, 8th Floor, Arlington, Virginia 22201, (703) 974-2808;
- (h) Anti-Drug Abuse Act certifications as required by 47 C.F.R. § 1.2002 are appended hereto;
- (i) certifications signed by an officer or duly authorized employee certifying that all information supplied in this application is true and accurate to the best of his or her information and belief are appended hereto.

In the Matter of)	
)	
Application by Verizon New)	
York, Inc., Verizon Long)	
Distance Company, Verizon)	CC Docket No
Enterprise Solutions, Verizon)	
Global Networks Inc., and)	
Verizon Select Services Inc., for)	
Authorization To Provide)	
In-Region, InterLATA Services)	
in Connecticut)	

DECLARATION AND VERIFICATION OF PAUL A. CROTTY AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION OF VERIZON NEW YORK, INC.

- I, Paul A. Crotty, declare under penalty of perjury that the foregoing is true and correct:
- 1. I am Group President-New York/Connecticut for Verizon; and I am authorized to make this declaration on behalf of Verizon New York, Inc.
- 2. I have reviewed the foregoing Application by Verizon New York, Inc. for Authorization To Provide In-Region, InterLATA Services in Connecticut, and the materials filed in support thereof.
- 3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
- 4. I further certify that Verizon New York, Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.

Executed on April 19, 2001.

Paul A. Crotty

In the Matter of)	
Annilla dia la Villa Nilla V)	
Application by Verizon New York, Inc.)	
Verizon Long Distance Company,)	
Verizon Enterprise Solutions, Verizon) CC Docket No	
Global Networks Inc., and Verizon)	
Select Services Inc., for Authorization)	
To Provide In-Region, InterLATA)	
Services in Connecticut)	
)	
)	

DECLARATION AND VERIFICATION OF MAURA C. BREEN AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION OF VERIZON LONG DISTANCE COMPANY

- I, Maura C. Breen, am President and Chief Executive Officer of Verizon Long Distance
 Company. I am authorized to make this declaration on behalf of Verizon Long Distance
 Company.
- 2. I have reviewed the foregoing Application by Verizon New York, Inc. for Authorization To Provide In-Region, InterLATA Services in Connecticut, and the materials filed in support thereof.
- 3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
- 4. I further certify that of Verizon Long Distance Company is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
- 5. I declare under penalty of perjury that the foregoing is true and correct. Executed on April 20, 2001.

Maura C. Breen

In the Matter of)	
)	
Application by Verizon New York, Inc.)	
Verizon Long Distance Company,)	
Verizon Enterprise Solutions, Verizon) CC Docket No.	
Global Networks Inc., and Verizon)	_
Select Services Inc., for Authorization)	
To Provide In-Region, InterLATA)	
Services in Connecticut)	
)	
)	

DECLARATION AND VERIFICATION OF STEVEN G. MCCULLY AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION VERIZON ENTERPRISE SOLUTIONS

- 1. I, Steven G. McCully, am President and Chief Executive Officer Verizon Enterprise Solutions. I am authorized to make this declaration on behalf Verizon Enterprise Solutions.
- 2. I have reviewed the foregoing Application by Verizon New York, Inc. for Authorization To Provide In-Region, InterLATA Services in Connecticut, and the materials filed in support thereof.
- 3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
- 4. I further certify that Verizon Enterprise Solutions is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
- 5. I declare under penalty of perjury that the foregoing is true and correct. Executed on April 21, 2001.

Steven G. McCully

In the Matter of)	
)	
Application by Verizon New York, Inc.)	
Verizon Long Distance Company,)	
Verizon Enterprise Solutions, Verizon)	CC Docket No.
Global Networks Inc., and Verizon)	
Select Services Inc., for Authorization)	
To Provide In-Region, InterLATA)	
Services in Connecticut)	
)	
	``	

DECLARATION AND VERIFICATION OF DEBRA A. KAUFMAN AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION OF VERIZON GLOBAL NETWORKS INC.

- 1. I, Debra A. Kaufman, am Chief Financial Officer, Treasurer and Secretary of Verizon Global Networks Inc. I am authorized to make this declaration on behalf of Verizon Global Networks Inc.
- 2. I have reviewed the foregoing Application by Verizon New York, Inc. for Authorization To Provide In-Region, InterLATA Services in Connecticut, and the materials filed in support thereof.
- 3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
- 4. I further certify that Verizon Global Networks Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
- 5. I declare under penalty of perjury that the foregoing is true and correct. Executed on Aprila/, 2001.

Debra A. Kaufman

In the Matter of)	
)	
Application by Verizon New York, Inc.)	
Verizon Long Distance Company,)	
Verizon Enterprise Solutions, Verizon)	CC Docket No
Global Networks Inc., and Verizon)	
Select Services Inc., for Authorization)	
To Provide In-Region, InterLATA)	
Services in Connecticut)	
)	
)	

DECLARATION AND VERIFICATION OF PAUL M. FUGLIE AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION OF VERIZON SELECT SERVICES INC.

- 1. I, Paul M. Fuglie, am Vice President Regulatory Affairs of Verizon Select Services Inc. I am authorized to make this declaration on behalf of Verizon Select Services Inc.
- 2. I have reviewed the foregoing Application by Verizon New York, Inc. for Authorization To Provide In-Region, InterLATA Services in Connecticut, and the materials filed in support thereof.
- 3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
- 4. I further certify that Verizon Select Services Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
- 5. I declare under penalty of perjury that the foregoing is true and correct. Executed on April 26, 2001.

Paul M. Fuglie

C

BRIEF ATTACHMENT C: DETAILED INDEX OF APPENDICES

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APPENDIX B	2
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Conduit Occupancy, and Right of Way Compliance	
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APPENDIX A

Declarations

Tab	Declarant	Subject
1	Paul A. Lacouture and Virginia P. Ruesterholz	Competitive Checklist
2	Kathleen McLean and Raymond Wierzbicki	Operations Support Systems
3	Julie A. Canny and Beth A. Abesamis	Performance Measurements
4	Robert H. Gertner and Gustavo E. Bamberger	Unbundled DSL Loop Performance Data
5	Susan C. Browning	Section 272 Compliance
6	Paul M. Fuglie	Section 272 Compliance
7	George C. Dowell	Separate Data Affiliate
8	William E. Taylor	Local Competition and InterLATA Competition

APPENDIX B

Selected Material

Volume 1

Tab 1: Record of Connecticut DPUC Docket No. 97-01-23 (Proceeding To Verify 271 Compliance)

Sub-Tab	Date	Description
A	08/27/97	DPUC's Initiation of Docket To Examine BA-NY's Compliance With
		Section 271
В	04/08/98	DPUC's Public Notice of Inspection of BA-NY's OSS
С	04/14/98	DPUC's Notice of Inspection of BA-NY's OSS
D	08/22/00	Cablevision's Comments
Е	09/06/00	DPUC's Decision re. SGAT
F	10/25/00	DPUC's Interim Decision re. Verizon's Compliance with Section 271
G	04/11/01	DPUC's Final Decision re. Verizon's Compliance with Section 271

Tab 2: Record of Connecticut DPUC Docket No. 98-10-16 (Investigation into the Construction and Pricing of Unbundled Network Elements)

Sub-Tab	Date	Description
Α	10/08/98	DPUC's Notice and Scope of Proceeding
В	03/11/99	DPUC's Decision re. Pricing Constructs for Development of UNE Combination Tariffs

Tab 3: Record of Connecticut DPUC Docket No. 99-05-30 (Application To Introduce Rates and Charges for Collocation)

Sub-Tab	Date	Description
Α	02/23/00	DPUC's Decision re. Approval of Tariff No. 11

Appendix B Volume 1 (Cont'd)

Tab 4: Record of Connecticut DPUC Docket No. 99-07-27 (Performance Proceeding To Adopt Performance Standards and Performance-Based Reporting)

Sub-Tab	Date	Description
Α	01/26/00	DPUC's Letter to Commission on Official Legal Publications re. Notice of
		Intent To Adopt Regulations
В	01/26/00	DPUC's Letter to Connecticut General Assembly re. Notice of Intent To
		Adopt Regulations
C	03/29/00	DPUC's Letter to Connecticut Attorney General re. Adoption of
		Regulations
D	03/29/00	DPUC's Letter to Office of Policy Management re. Adoption of
		Regulations
Е	04/27/00	Attorney General's Letter to DPUC re. Declining To Recommend
		Approval
F	05/02/00	DPUC's Letter to LRCC re. 60 Day Extension To Submit Regulations
G	06/26/00	DPUC's Letter to LRCC re. 90 Day Extension To Submit Regulations
Н	10/02/00	DPUC's Letter to LRCC re. 120 Day Extension To Submit Regulations
I	03/20/01	DPUC's Letter to LRCC re. 120 Day Extension To Submit Regulations

Tab 5: Record of Connecticut DPUC Docket No. 97-08-14 (Application To Introduce Rates and Regulations for Resale Services)

Sub-Tab	Date	Description
A	10/06/97	DPUC's Letter Denying AT&T's Request To Suspend a Portion of
		NYNEX's Tariff No. 9 and Postpone Hearing
В	11/05/97	DPUC's Decision Approving NYNEX's Tariff No. 9

Tab 6: Record of Connecticut DPUC Docket No. 98-02-01 (Investigation into Rebundling of Telephone Company Network Elements)

Sub-Tab	Date	Description
A	02/27/98	DPUC's Initiation of Docket To Investigate Rebundling of BA-NY's Local
		Telecommunications Network
B	07/08/98	DPUC's Decision Ordering Filing of UNE Combination Tariff
C		DPUC's Decision Denying BA-NY's and SNET's Petitions for
		Reconsideration and Granting Extensions of Time

Appendix B Volume 1 (Cont'd)

Tab 7: Record of Connecticut DPUC Docket No. 94-11-03
(Investigation into the Unbundling of BA-NY's
Telecommunications Network)

Sub-Tab	Date	Description
A	11/21/94	DPUC's Initiation of Docket To Investigate Unbundling of BA-NY's
		Local Telecommunications Network
В	08/20/99	DPUC's Notice of Scope and Schedule
C	12/16/99	DPUC's Notice of Revised Scope and Schedule
D	05/17/00	DPUC's Decision Approving BA-NY's Tariff No. 12

Tab 8: Record of Connecticut DPUC Docket No. 99-03-21 (Application for Proposed Tariff for UNE Rebundled Service)

Sub-Tab	Date	Description
Α	03/24/99	DPUC's Acknowledgment of BA-NY's Application for Proposed Tariff
		for UNE-Rebundled Service
В	06/18/99	DPUC's Notice and Scope of Proceeding
С	05/17/00	DPUC's Decision Approving BA-NY's Tariff for UNEs-Rebundled
		Service

Tab 9: Record of Connecticut DPUC Docket No. 98-02-27 (Investigation into the Provision of Shared Transport)

Sub-Tab	Date	Description
Α	07/08/98	DPUC's Notice of Scope and Docket Schedule
В	06/21/00	DPUC's Decision Requiring Filing of Shared Transport Tariff
С	08/23/00	DPUC's Errata Notice re. Decision Requiring Filing of Shared Transport Tariff

Tab 10: Record of Connecticut DPUC Docket No. 94-10-04 (Investigation into Participative Architecture Issues)

Sub-Tab	Date	Description
Α	08/07/96	DPUC's Decision re. Infrastructure Development

Appendix B Volume 1 (Cont'd)

Tab 11: Record of New York PSC Case No. 00-C-0127 (Proceeding Examining the Provision of Digital Subscriber Line Services)

Sub-Tab	Date	Description
Α	01/21/00	PSC's Order Instituting Proceeding To Examine Digital Subscriber Line
		Issues
В	04/18/00	PSC's Approval of DPS's 04/07/00 Recommendation for Approval of BA-
		NY's Tariff Revisions
C	04/24/00	PSC's Order Adopting BA-NY's Line Sharing Schedule for Provision of
		DSL Service
D	07/20/00	PSC's Approval of DPS's 07/14/00 Recommendation To Adopt PSC's
		04/24/00 Order as Permanent Agency Action
Е	07/27/00	PSC's Order Approving Tariff Filing Excepting Provisions for House and
		Riser Cable
F	10/31/00	PSC's Opinion and Order Concerning Verizon NY's Wholesale Provision
		of DSL Capabilities
G	01/29/01	PSC's Order Granting Clarification, Granting Reconsideration in Part and
		Denying Reconsideration in Part, and Adopting Schedule

Tab 12: Selected New York PSC Orders

Sub-Tab	Date	Description
Α	02/16/00	NY PSC Order Establishing Additional Inter-Carrier Service Quality
		Guidelines and Granting in Part Petitions for Reconsideration and
		Clarification (Case No. 97-C-0139)
В	06/27/00	NY PSC's Order Approving BA-NY's 05/05/00 Tariff Filing (Case No.
		00-C-0846)
C	06/28/00	NY PSC's Order Approving Transfer with Conditions (Case No. 00-C-
		0725)
D	07/27/00	NY PSC Order Addressing OSS Issues (Case Nos. 00-C-0008, 00-C-0009,
		and 99-C-0949)
Е	12/15/00	NY PSC's Order Adopting Revisions to Inter-Carrier Service Quality
		Guidelines (Case No. 97-C-0139)

Appendix B Volume 2a-c

Tab 13: Third-Party Evaluation Material

Sub-Tab	Date	Description
Α	08/06/99	KPMG's Bell Atlantic OSS Evaluation Project Final Report
В	01/16/01	Verizon's Joint Supplemental Declaration of R. Sapienza and J. Mulcahy (Without Attachments) (CC Docket No. 01-9)
С	02/28/01	Verizon's Joint Supplemental Reply Declaration of R. Sapienza and J. Mulcahy (Without Attachments) (CC Docket No. 01-9)

Volume 3a-b

Tab 14: Additional Selected Documents

Sub-Tab	Date	Description
A	12/30/99	DPUC 1999 Annual Report to General Assembly on Status of
		Telecommunications in Connecticut (Docket No. 99-01-18)
В	08/09/00	Verizon NY's State of Connecticut No. 9 - Telephone Resale Services
		Tariff
C	08/09/00	Verizon NY's State of Connecticut No. 10 - Telephone Network
		Combinations Tariff
D	01/05/01	Verizon NY's State of Connecticut No. 12 - Telephone Network Elements
		Tariff
Е	03/20/01	Network Plus's Connecticut D.P.U.C. Tariff No. 3
F	04/03/01	Verizon NY's State of Connecticut No. 11 - Telephone Network
		Interconnection Services Tariff
G	04/11/01	DPUC's Decision Approving Arbitration Award re. Cablevision's
		Interconnection Agreement (Docket No. 00-10-22)

APPENDIX C

Methods and Procedures for Line Sharing, Pole Attachments, Conduit Occupancy, and Right of Way Compliance

Vol.	Tab	Description	
1	1	Verizon NY's Methods and Procedures for Line Sharing	
1	2	Verizon NY's Methods and Procedures for Pole Attachments, Conduit Occupancy, and Right of Way Compliance	

APPENDIX D

Compliance with Section 272 and Separate Data Affiliate Requirements

Vol.	Tab	Date	Description
la-b	1	09/22/00	Verizon's Declaration of S. Browning (CC Docket No. 00-176)
1b	2	01/16/01	Verizon's Supplemental Declaration of G. Dowell (CC Docket No. 01-9)

APPENDIX E

Selected Interconnection Agreements

Vol.	Tab	Date	Description
1	1	04/27/98	MCImetro Access Transmission Services, Inc.
2	2	08/13/98	Cablevision Lightpath - CT, Inc.
2	3	12/17/98	DIECA Communications, Inc. d/b/a Covad Communications Company
3	4	11/10/99	AT&T Communications of New England, Inc.
4	5	06/06/00	Verizon Advanced Data Services f/k/a Bell Atlantic Network Data, Inc.
4a-b	6	12/07/00	Advanced Telcom Group, Inc.
4b	7	02/09/01	Network Plus, Inc.
5	8	04/06/01	Verizon NY's Model Interconnection Agreement
5	9	04/20/01	Verizon NY's Statement of Generally Available Terms and Conditions

APPENDIX F

Inter-Carrier Quality Service Guidelines and Performance Assurance Plan

Vol.	Tab	Date	Description
1	1	02/29/00	Verizon NY's Inter-Carrier Quality Service Guidelines (Case No. 97-C-0139)
1	2	01/16/01	Verizon NY's Revised Inter-Carrier Quality Service Guidelines (Case No. 97-C-0139)
1	3	04/20/01	Verizon NY's Connecticut Performance Assurance Plan

APPENDIX G

Carrier to Carrier Reports

The material located in this appendix is proprietary and provided only in electronic format.

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

- o An oversize page or document (such as a map) which was too large to be scanned into the ECFS system.
 - o Microfilm, microform, certain photographs or videotape.
- o Other materials which, for one reason or another, could not be scanned into the ECFS system.

The actual document, page(s) or materials may be reviewed by contacting an Information Technician at the FCC Reference Information Center, at 445 12th Street, SW, Washington, DC, Room CY-A257. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician.

Application by Verizon New York Inc., et al. For Authorization to Provide In-Region, InterlATA Services in Connecticut

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Appendix	Α	Volume 2	
Appendix	Α	Volume 3	
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Appendix	В	Volume 2b	Tab 13A
Appendix	В	Volume 2c	Tabs 13a-13c
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Appendix	D	Volume 1a	Tab 1
Appendix	D	Volume 1b	Tabs 1-2
Appendix	Ε	Volume 1	Tab 1
Appendix	Ε	Volume 2	Tabs 2-3
Appendix	Ε	Volume 3	Tabs 4-5
Appendix	Ε	Volume 4a	Tab 6
Appendix	Ε	Volume 4b	Tabs 6-7
Appendix	Ε	Volume 5	Tabs 8-9
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